

THE URBAN LAW FIRM

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; *et al.*,

Plaintiffs,

vs.

HARRAH'S LAS VEGAS, LLC f/k/a
HARRAH'S LAS VEGAS, INC. d/b/a
HARRAH'S LAS VEGAS, *et al.*,

Defendants.

CASE NO. 2:13-cv-00040-APG-PAL

Consolidated with Case Nos.:
2:13-cv-00043;
2:13-cv-00042;
2:13-cv-00046; and
2:13-cv-00047

**JOINT STATUS REPORT PER COURT
MINUTE ORDER OF JUNE 29, 2016
(DKT. 92)**

Plaintiffs, Trustees of the Nevada Resort Association—International Alliance of
Theatrical Stage Employees and Moving Picture Machine Operators of the United States and
Canada, Local 720, Pension Trust; Trustees of the Nevada Resort Association—International
Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United
States and Canada, Local 720, Wage Disability Trust; and Trustees of the Nevada Resort
Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine
Operators of the United States and Canada, Local 720, Apprentice and Journeyman Training and

1 Education Trust (collectively, “Plaintiffs” or “Trusts”), by and through their counsel of record,
2 The Urban Law Firm, and Consolidated Defendants Harrah’s Las Vegas, LLC; Flamingo Las
3 Vegas Operating Company, LLC; Desert Palace, Inc.; Paris Las Vegas Operating Company,
4 LLC; and Parball Corporation (collectively “Consolidated Defendants”), by and through their
5 counsel of record, Littler Mendelson, file this Joint Status Report in response to the Court’s
6 Order directing the same. (ECF No. 92).

7 The Court held a status check in this matter on June 29, 2016. At the status check, the
8 parties were directed to file a stipulation for dismissal or a status report on July 12, 2016. The
9 Court requested a status report to indicate the status of the completion of the parties’ settlement
10 of these disputed and consolidated cases. Putting the settlement of this matter into writing has
11 proven more difficult than initially anticipated by the parties because of the breadth of issues
12 involved and the number of parties in the case. Another issue that complicated putting this
13 settlement into writing was the Desert Palace, Inc. d/b/a Caesars Palace bankruptcy case, which
14 affected the claims against one of the Consolidated Defendants in this matter. This necessitated
15 contact with the bankrupt entity’s Chapter 11 counsel to ensure the settlement did not run afoul
16 of the Bankruptcy Code.

17 After initial drafts of each of the agreements were completed by Defendants’ counsel,
18 some edits were needed to the Desert Palace, Inc. d/b/a Caesar Palace settlement agreement as a
19 result of the aforementioned bankruptcy case. The draft agreements were reviewed by Plaintiffs’
20 counsel and several edit were made concerning releases of claims and waivers of defenses.
21 Those edits have been provided to Defendants’ counsel and are being considered by Defendants’
22 counsel and the Defendants.

23 After consultation between Plaintiffs’ counsel and Consolidated Defendants’ counsel, it
24 is agreed that they will need a few more weeks to ensure the specific written terms of the
25 settlement agreement are agreed upon and executed by all parties. The parties joint stipulate,
26 propose and request this Court order the parties file a stipulation for dismissal within 45 days of
27 the date of this status report. If the parties have not done so within 45 days of the date of this
28

1 status report, the parties propose the Court order a status report on that date to explain why the
2 case has not yet been dismissed.

3
4 Dated: July 12, 2015

5 /s/ Nathan R. Ring
6 Michael A. Urban, Esq.
7 Nathan R. Ring, Esq.
8 Sean W. McDonald, Esq.
9 THE URBAN LAW FIRM
10 *Attorneys for Plaintiffs*

Dated: July 12, 2016

/s/ Rick D. Roskelley
Rick D. Roskelley, Esq.
LITTLER MENDELSON, P.C.
Attorneys for Consolidated Defendants

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ORDER

Based on the joint status report of the parties and with good cause appearing, the parties' are directed to file a stipulation for dismissal within forty-five (45) days of this Order. If such a stipulation is not filed within forty-five (45) days of this Order, the parties must provide a status report to this court explaining why the case has not yet been dismissed.

IT IS FURTHER ORDERED that no further extensions will be allowed. If the parties have not finalized their settlement and stipulated to dismiss by August 10, 2016, they will be required to file a joint pretrial order no later than August 24, 2016.

Dated: July 18, 2016


UNITED STATES MAGISTRATE JUDGE